

JEFFREY S. CHIESA
Attorney General of New Jersey
Attorney for Petitioner
State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, New Jersey 08401

By: R. Lane Stebbins
Deputy Attorney General
(609) 317-6218

STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 13-0052-EL

STATE OF NEW JERSEY, DEPARTMENT
OF LAW AND PUBLIC SAFETY,
DIVISION OF GAMING ENFORCEMENT,

Petitioner,

v.

PEGGY J. ANDRADE, a/k/a
JANET ANDRADE,

Respondent.

Civil Action

PETITION FOR
PLACEMENT ON
EXCLUSION LIST

Petitioner, State of New Jersey, Department of Law and Public Safety,
Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic
City, New Jersey, 08401 says:

1. Respondent, PEGGY J. ANDRADE, a/k/a Janet Andrade ("Andrade"), is a resident of New Jersey, having an address of 370 Madison Avenue, Paterson, New Jersey 07524 or 7 South Montpelier Avenue, Atlantic City NJ 08401.

2. N.J.A.C. 13:69D-1.3(a)4 provides, in pertinent, part for the exclusion of any person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including

iii Persons who pose a threat to the safety of the patrons or employees of a casino licensee

iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees.

3. On December 22, 2008, Andrade was arrested by the Atlantic City Police Department and charged with Improper Behavior, N.J.S.A. 2C:33-2A. Thereafter, she was charged in Superseding Atlantic County Indictment 10-00-0042 with Possession of a Weapon, N.J.S.A. 2C:39-3e; Possession of a Weapon for an Unlawful Purpose, N.J.S.A. 2C:39-5d; and Possession of a Weapon by a Prohibited Person, N.J.S.A. 2C:39-7. On February 22, 2010, Andrade was convicted of the amended charge of Obstructing Justice, N.J.S.A. 2C:29-1 and the charges related to weapons were dismissed. She was sentenced to a one year probationary term.

4. On May 22, 2009, Andrade was present at Caesars Atlantic City

Casino Hotel ("Caesars") in the Toga Bar. She was recognized as a person who had previously been evicted from the licensed premises on prior occasions. As she was being escorted off the premises Andrade became disruptive and damaged property. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3 and Disorderly Conduct, N.J.S.A. 2C:33-2. On May 28, 2010, Andrade was convicted of the offense by the Atlantic City Municipal Court. In addition to monetary penalties Andrade was barred from the Caesars facility for a term of 2 years.

5. On July 2, 2009, Andrade was arrested by the New Jersey State Police and charged with Prostitution, N.J.S.A. 2C:34-1B(1). Andrade allegedly solicited a New Jersey State Trooper then in an undercover capacity. Andrade was charged in Atlantic County Indictment 09-10-2533 with the offense. On February 22, 2010, Andrade was convicted of Prostitution, N.J.S.A. 2C:34-1B(1) which had been downgraded to a disorderly persons offense. She was sentenced to a one year probationary term.

6. On August 18, 2009, Andrade was present at the Borgata and was observed by a member of the security department as a person who had previously been evicted from the licensed premises on three prior occasions for solicitation. During an interview Andrade admitted she was a prostitute. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On May 28, 2010, Andrade was convicted of the offense. She was fined and was ordered barred

from the Borgata for a term of two years.

7. On September 4, 2009, Andrade was present at Caesars on the gaming floor. She was recognized as a person who had previously been evicted from the licensed premises on prior occasions. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On May 28, 2010, Andrade was convicted of the offense by the Atlantic City Municipal Court.

8. On September 7, 2009, Andrade was present at the Borgata and was observed by a member of the security department as a person who had previously been evicted from the licensed premises on prior occasions for solicitation and defiant trespass. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On May 28, 2010, Andrade was convicted of the offense by the Atlantic City Municipal Court.

9. On December 29, 2009, Andrade was present at Caesars in the Toga Bar. She was recognized as a person who had previously been evicted from the licensed premises on prior occasions. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On May 28, 2010, Andrade was convicted of the offense by the Atlantic City Municipal Court.

10. On March 1, 2010, Andrade was present at Borgata and was

recognized by a member of the security department as a person who had previously been evicted from the licensed premises on prior occasions. Andrade was arrested by the New Jersey State Police and was charged with Defiant Trespass, N.J.S.A. 2C:18-3. On May 28, 2010, Andrade was convicted of the offense. She was fined and was ordered barred from the Borgata for a term of two years.

11. On July 26, 2010, Andrade was present at the B-Bar in Borgata. Andrade allegedly solicited a Borgata security officer offering sexual services for money. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On October 13, 2010, Andrade was convicted of the offense. She was fined and was ordered barred from the Borgata for a term of two years.

12. On June 4, 2012, Andrade was present in Resorts Hotel Casino ("Resorts") and was recognized by a Resorts security officer as a prior evictee. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On June 9, 2012, the Resorts security officer signed a complaint charging Andrade with Assault, N.J.S.A. 2C:12-1(a) based upon the events which occurred on June 4, 2012. On September 17, 2012, Andrade was convicted of Defiant Trespass and the amended charge of Disorderly Conduct, N.J.S.A. 2C:33-1. She was fined and was ordered barred from Resorts for a term of two years.

13. On June 24, 2012, Andrade was present in the licensed premises of Bally's and was recognized by a Bally's security officer as a prior evictee. Andrade was arrested by the New Jersey State Police and charged with Defiant Trespass, N.J.S.A. 2C:18-3. On September 17, 2012, Andrade was convicted of the offense. She was fined and ordered to remain out of Bally's licensed premises for a term of 2 years.

14. Based on information contained in Paragraphs 1 through 13 of this petition, Andrade is a person whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C.13:69G-1.3(a)4.

WHEREFORE, Petitioner demands the following relief against Respondent, Peggy J. Andrade:

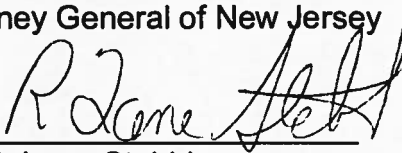
A. Judgment that the Respondent, Peggy J. Andrade a/k/a Janet Andrade, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C.13:69G-1.3(a)4;

B. Judgment entering a Final Order placing Respondent, Peggy J. Andrade a/k/a Janet Andrade, on the exclusion list pursuant to N.J.S.A. 5:12-71(l) and 13:69G-1.3(a) 4; and,

C. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

JEFFREY S. CHIESA
Attorney General of New Jersey

By: 
R. Lane Stebbins
Deputy Attorney General

Dated

January 23, 2013